## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

CommScope, Inc., CommScope Inc. of North Carolina, and CommScope Technologies, LLC,	) Civil Action No. 19-cv-15962-JXN-) LDW
Plaintiffs,	)
V.	)
Rosenberger Technology (Kunshan) Co. Ltd., Rosenberger Asia Pacific Electronic Co., Ltd., Rosenberger Technology LLC, Rosenberger USA Corp., Rosenberger North America Pennsauken, Inc., Rosenberger Site Solutions, LLC, Rosenberger Hochfrequenztechnik GmbH & Co. KG, Northwest Instrument, Inc., and CellMax Technologies AB	) CONSOLIDATED INDEX IN ) SUPPORT OF JOINT MOTION ) TO SEAL COMMSCOPE'S ) LETTER REQUEST TO ) COMPEL DISCOVERY ) ) )
Defendants	,

## I. <u>Documents previously sealed</u> and submitted in connection with CommScope's Letter Request to Compel Rosenberger to Produce Specific Hardware Discovery (ECF No. 490).

Document	Basis for Sealing	Clearly Defined and Serious Injury	Why a Less Restrictive	Party in Opposition to Sealing, if any,
		that Would Result	Alternative to the	and Basis
		if the Relief is Not	Relief Sought is Not	
G G ;		Granted	Available	11 2021 ECEN
CommScope's		-	roceedings held on Apr	
Letter Request to	· ·	ECF No. 398 (noting ti	ranscript is "unavailable	e for public
Compel Discovery	viewing").			
(ECF No. 490): at 25	C1-:	C1-1 T		1 21 2021 ECE
CommScope's		-	roceedings held on Sept	-
Letter Request to		cket, ECF No. 4/4 (noti	ing transcript is "unavai	lable for public
Compel Discovery	viewing").			
(ECF No. 490): at 27				
Exhibit 19 (ECF No.				
490-20) to the				
Declaration of				
Randall E. Kahnke				
in Support of				
CommScope's				
Motion to Compel				
Specific Hardware				
Discovery Against				
Rosenberger				
Defendants (ECF				
No. 490-1)				

Exhibit 23 (ECF No.	
490-24) to the	
Declaration of	
Randall E. Kahnke	
in Support of	
CommScope's	
Motion to Compel	
Specific Hardware	
Discovery Against	
Rosenberger	
Defendants (ECF	
No. 490-1): at 4	
Exhibit 20 to the	Subject to the Court's Sealing Order, ECF No. 404, granting Joint Motion to Seal
Declaration of	Pursuant to L. Civ. R. 5.3, ECF No. 396-4. See also Consolidated Index in Support of the
Randall E. Kahnke	Joint Motion to Seal, ECF No. 396-1 (moving to seal Materials Submitted with the Parties
(ECF No. 490-21)	Joint Submission for the April 1, 2021 Telephone Conference).
Exhibit 21 to the	Subject to the Court's Sealing Order, ECF No. 487, granting Joint Motion to Seal
Declaration of	Pursuant to L. Civ. R. 5.3, ECF No. 472-8. See also Consolidated Index in Support of the
Randall E. Kahnke	Joint Motion to Seal, ECF No. 472-3 (moving to seal Materials Submitted with
(ECF No. 490-22)	CommScope's Motion to Compel Hardware Discovery).

## II. <u>Documents submitted in connection with CommScope's Letter Request to Compel Rosenberger to Produce Specific Hardware Discovery (ECF No. 490).</u>

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
Letter Request to Compel Discovery (ECF No. 490): at 3 n.3	Letter reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential	information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about	Letter proposed that may be filed publicly.	oppose the motion to seal.
	and non-public information about CommScope's business practices and procedures. ( <i>See</i> Declaration of Farid Firouzbakht ("Firouzbakht Decl.")	CommScope's business practices and procedures. (Firouzbakht Decl. ¶ 3).		

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
CommScope's Letter Request to Compel Discovery (ECF No. 490): at 6 n.5	This portion of the Letter reveals discovery information that has been designated Confidential under the Discovery Confidentiality Order (ECF No. 22). (Firouzbakht Decl. ¶ 2).	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal discovery information and requests that have been designated Confidential under the Discovery Confidentiality Order. (Firouzbakht Decl. ¶ 3).	Redacted version of Letter proposed that may be filed publicly.	Defendants do not oppose the motion to seal.
CommScope's Letter Request to Compel Discovery (ECF No. 490): at 7-9, 11-15, 17, 19	These portions of the Letter reveal information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would	Redacted version of Letter proposed that may be filed publicly.	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (See Firouzbakht Decl. ¶ 2).	reveal confidential and non-public information about CommScope's trade secrets. (Firouzbakht Decl. ¶ 3).		
Declaration of Randall E. Kahnke (ECF No. 490-1) in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490)	This Declaration reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (See	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets.  (Firouzbakht Decl. ¶ 3).	Redacted version of Declaration proposed that may be filed publicly.	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	Firouzbakht Decl. ¶ 2).			
Exhibit 1 (ECF No. 490-2) to the Declaration of Randall E. Kahnke in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	This Exhibit reveals discovery information that has been designated Confidential under the Discovery Confidentiality Order (ECF No. 22). (Firouzbakht Decl. ¶ 2).	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal discovery information and requests that have been designated Confidential under the Discovery Confidentiality Order. (Firouzbakht Decl. ¶ 3).	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Defendants do not oppose the motion to seal.
Exhibit 4 (ECF No.	This Exhibit reveals	Disclosure of this	The confidential	Defendants do not
490-5) to the	discovery information	information would	information in this	oppose the motion
Declaration of	that has been	cause clearly	document is	to seal.
Randall E. Kahnke	designated	defined and serious	sufficiently	
in Support of	Confidential under the	injury to	pervasive so as to	

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	Discovery Confidentiality Order (ECF No. 22). (Firouzbakht Decl. ¶ 2).	CommScope because it would reveal discovery information and requests that have been designated Confidential under the Discovery Confidentiality Order. (Firouzbakht Decl. ¶ 3).	render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	
Exhibit 5 (ECF No. 490-6) to the Declaration of Randall E. Kahnke in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets.	Redacted version of Exhibit proposed that may be filed publicly.	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	secrets. (See	(Firouzbakht Decl.		
	Firouzbakht Decl.	$\P$ 3).		
	¶ 2).			
Exhibit 6 (ECF No.	This Exhibit reveals	Disclosure of this	Redacted version of	Defendants do not
490-7) to the	information that has	information would	Exhibit proposed	oppose the motion
Declaration of	been designated	cause clearly	that may be filed	to seal.
Randall E. Kahnke	Confidential and/or	defined and serious	publicly.	
in Support of	Attorneys' Eyes Only	injury to		
CommScope's	under the Discovery	CommScope		
Motion to Compel	Confidentiality Order	because it would		
Specific Hardware	(ECF No. 22),	reveal confidential		
Discovery Against	including confidential	and non-public		
Rosenberger	and non-public	information about		
Defendants (ECF	information about	CommScope's trade		
No. 490-1)	CommScope's trade	secrets.		
	secrets. (See	(Firouzbakht Decl.		
	Firouzbakht Decl.	$\P$ 3).		
	¶ 2).			
Exhibit 7 (ECF No.	This Exhibit reveals	Disclosure of this	Redacted version of	Defendants do not
490-8) to the	information that has	information would	Exhibit proposed	oppose the motion
Declaration of	been designated	cause clearly	that may be filed	to seal.
Randall E. Kahnke	Confidential and/or	defined and serious	publicly.	
in Support of	Attorneys' Eyes Only	injury to		

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result	Why a Less Restrictive Alternative to the	Party in Opposition to Sealing, if any, and
		if the Relief is Not Granted	Relief Sought is Not Available	Basis
CommScope's	under the Discovery	CommScope		
Motion to Compel	Confidentiality Order	because it would		
Specific Hardware	(ECF No. 22),	reveal confidential		
Discovery Against	including confidential	and non-public		
Rosenberger	and non-public	information about		
Defendants (ECF	information about	CommScope's trade		
No. 490-1)	CommScope's trade	secrets.		
	secrets. (See	(Firouzbakht Decl.		
	Firouzbakht Decl.	$\P$ 3).		
	¶ 2).			
Exhibit 8 (ECF No.	This Exhibit reveals	Disclosure of this	The confidential	Defendants do not
490-9) to the	information that has	information would	information in this	oppose the motion
Declaration of	been designated	cause clearly	document is	to seal.
Randall E. Kahnke	Confidential and/or	defined and serious	sufficiently	
in Support of	Attorneys' Eyes Only	injury to	pervasive so as to	
CommScope's	under the Discovery	CommScope	render redaction	
Motion to Compel	Confidentiality Order	because it would	unreasonable and	
Specific Hardware	(ECF No. 22),	reveal confidential	unduly burdensome.	
Discovery Against	including confidential	and non-public	Virtually the	
Rosenberger	and non-public	information about	entirety of the	
Defendants (ECF	information about	CommScope's trade	document would	
No. 490-1)	CommScope's trade	secrets.	require redaction to	
	secrets. (See		prevent a substantial	

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	Firouzbakht Decl.	(Firouzbakht Decl.	risk of competitive	
	¶ 2).	¶ 3).	injury.	
Exhibit 9 (ECF No.	This Exhibit reveals	Disclosure of this	Redacted version of	Defendants do not
490-10) to the	information that has	information would	Exhibit proposed	oppose the motion
Declaration of	been designated	cause clearly	that may be filed	to seal.
Randall E. Kahnke	Confidential and/or	defined and serious	publicly.	
in Support of	Attorneys' Eyes Only	injury to		
CommScope's	under the Discovery	CommScope		
Motion to Compel	Confidentiality Order	because it would		
Specific Hardware	(ECF No. 22),	reveal confidential		
Discovery Against	including confidential	and non-public		
Rosenberger	and non-public	information about		
Defendants (ECF	information about	CommScope's		
No. 490-11)	CommScope's	business practices		
	business practices and	and procedures.		
	procedures. (See	(Firouzbakht Decl.		
	Firouzbakht Decl.	$\P$ 3).		
	$\P$ 2).			
Exhibit 10 (ECF	This Exhibit reveals	Disclosure of this	Redacted version of	Defendants do not
No. 490-11) to the	information that has	information would	Exhibit proposed	oppose the motion
Declaration of	been designated	cause clearly	that may be filed	to seal.
Randall E. Kahnke	Confidential and/or	defined and serious	publicly.	
in Support of	Attorneys' Eyes Only	injury to		

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (See Firouzbakht Decl. ¶ 2).	CommScope because it would reveal confidential and non-public information about CommScope's trade secrets.  (Firouzbakht Decl. ¶ 3).		
Exhibit 11 (ECF No. 490-12) to the Declaration of Randall E. Kahnke in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (See	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets.	Redacted version of Exhibit proposed that may be filed publicly.	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	Firouzbakht Decl.	(Firouzbakht Decl.		
E 131 1 10 (ECE	¶ 2).	¶ 3).	D 1 . 1	D C 1 1 1
Exhibit 12 (ECF	This Exhibit reveals	Disclosure of this	Redacted version of	Defendants do not
No. 490-13) to the	information that has	information would	Exhibit proposed	oppose the motion
Declaration of	been designated	cause clearly	that may be filed	to seal.
Randall E. Kahnke	Confidential and/or	defined and serious	publicly.	
in Support of	Attorneys' Eyes Only	injury to		
CommScope's	under the Discovery	CommScope		
Motion to Compel	Confidentiality Order	because it would		
Specific Hardware	(ECF No. 22),	reveal confidential		
Discovery Against	including confidential	and non-public		
Rosenberger	and non-public	information about		
Defendants (ECF	information about	CommScope's trade		
No. 490-1)	CommScope's trade	secrets.		
	secrets. (See	(Firouzbakht Decl.		
	Firouzbakht Decl. ¶ 2).	¶ 3).		
Exhibit 13 (ECF	This Exhibit reveals	Disclosure of this	Redacted version of	Defendants do not
No. 490-14) to the	information that has	information would	Exhibit proposed	oppose the motion
Declaration of	been designated	cause clearly	that may be filed	to seal.
Randall E. Kahnke	Confidential and/or	defined and serious	publicly.	
in Support of	Attorneys' Eyes Only	injury to	-	
CommScope's	under the Discovery	CommScope		

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (See Firouzbakht Decl. ¶ 2).	because it would reveal confidential and non-public information about CommScope's trade secrets.  (Firouzbakht Decl.  ¶ 3).		
Exhibit 14 (ECF No. 490-15) to the Declaration of Randall E. Kahnke in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (See	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets.  (Firouzbakht Decl. ¶ 3).	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	Firouzbakht Decl.		risk of competitive	
	¶ 2).		injury.	
Exhibit 15 (ECF	This Exhibit reveals	Disclosure of this	Redacted version of	Defendants do not
No. 490-16) to the	information that has	information would	Exhibit proposed	oppose the motion
Declaration of	been designated	cause clearly	that may be filed	to seal.
Randall E. Kahnke	Confidential and/or	defined and serious	publicly.	
in Support of	Attorneys' Eyes Only	injury to		
CommScope's	under the Discovery	CommScope		
Motion to Compel	Confidentiality Order	because it would		
Specific Hardware	(ECF No. 22),	reveal confidential		
Discovery Against	including confidential	and non-public		
Rosenberger	and non-public	information about		
Defendants (ECF	information about	CommScope's trade		
No. 490-1)	CommScope's trade	secrets.		
	secrets. (See	(Firouzbakht Decl.		
	Firouzbakht Decl.	¶ 3).		
	¶ 2).			
Exhibit 16 (ECF	This Exhibit reveals	Disclosure of this	Redacted version of	Defendants do not
No. 490-17) to the	information that has	information would	Exhibit proposed	oppose the motion
Declaration of	been designated	cause clearly	that may be filed	to seal.
Randall E. Kahnke	Confidential and/or	defined and serious	publicly.	
in Support of	Attorneys' Eyes Only	injury to		
CommScope's	under the Discovery	CommScope		

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
Motion to Compel Specific Hardware	Confidentiality Order (ECF No. 22),	because it would reveal confidential		
Discovery Against	including confidential	and non-public		
Rosenberger	and non-public	information about		
Defendants (ECF	information about	CommScope's trade		
No. 490-1)	CommScope's trade	secrets.		
,	secrets. (See	(Firouzbakht Decl.		
	Firouzbakht Decl.	$\P$ 3).		
	¶ 2).			
Exhibit 17 (ECF	This Exhibit reveals	Disclosure of this	Redacted version of	Defendants do not
No. 490-18) to the	information that has	information would	Exhibit proposed	oppose the motion
Declaration of	been designated	cause clearly	that may be filed	to seal.
Randall E. Kahnke	Confidential and/or	defined and serious	publicly.	
in Support of	Attorneys' Eyes Only	injury to		
CommScope's	under the Discovery	CommScope		
Motion to Compel	Confidentiality Order	because it would		
Specific Hardware	(ECF No. 22),	reveal confidential		
Discovery Against	including confidential	and non-public		
Rosenberger	and non-public	information about		
Defendants (ECF	information about	CommScope's trade		
No. 490-1)	CommScope's trade	secrets.		
	secrets. (See	(Firouzbakht Decl.		
		$ \P 3\rangle$ .		

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	Firouzbakht Decl. ¶ 2).			
Exhibit 19 (ECF No. 490-20) to the Declaration of Randall E. Kahnke in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490-1)	This Exhibit reveals discovery information that has been designated Confidential under the Discovery Confidentiality Order (ECF No. 22) as well as confidential and non-public information about CommScope's trade secrets and CommScope's business practices and procedures. (Firouzbakht Decl. ¶ 2).	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal discovery information and requests that have been designated Confidential under the Discovery Confidentiality Order. (Firouzbakht Decl. ¶ 3).	Redacted version of Exhibit proposed that may be filed publicly.	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not	Why a Less Restrictive Alternative to the Relief Sought is	Party in Opposition to Sealing, if any, and Basis
Exhibit 23 (ECF	This Exhibit reveals	Granted Disclosure of this	Not Available Redacted version of	Defendants do not
No. 490-24) to the	information that has	information would	Exhibit proposed	oppose the motion
Declaration of	been designated	cause clearly	that may be filed	to seal.
Randall E. Kahnke	Confidential and/or	defined and serious	publicly.	
in Support of	Attorneys' Eyes Only	injury to		
CommScope's	under the Discovery	CommScope		
Motion to Compel	Confidentiality Order	because it would		
Specific Hardware	(ECF No. 22),	reveal confidential		
Discovery Against	including confidential	and non-public		
Rosenberger	and non-public	information about		
Defendants (ECF	information about	CommScope's trade		
No. 490-1)	CommScope's trade	secrets.		
	secrets. (See	(Firouzbakht Decl.		
	Firouzbakht Decl.	¶ 3).		
	¶ 2).			

Exhibit 24 (ECF	This Exhibit reveals	Disclosure of this	Redacted version of	Defendants do not
No. 490-25) to the	information that has	information would	Exhibit proposed	oppose the motion
Declaration of	been designated	cause clearly	that may be filed	to seal.
Randall E. Kahnke	Confidential and/or	defined and serious	publicly.	
in Support of	Attorneys' Eyes Only	injury to		
CommScope's	under the Discovery	CommScope		
Motion to Compel	Confidentiality Order	because it would		
Specific Hardware	(ECF No. 22),	reveal confidential		
Discovery Against	including confidential	and non-public		
Rosenberger	and non-public	information about		
Defendants (ECF	information about	CommScope's trade		
No. 490-1)	CommScope's trade	secrets.		
	secrets. (See	(Firouzbakht Decl.		
	Firouzbakht Decl.	¶ 3).		
	$\P$ 2).			
Expert Declaration	This Declaration	Disclosure of this	Redacted version of	Defendants do not
of Dr. Daniel van	reveals information	information would	Declaration	oppose the motion
der Weide (ECF No.	that has been	cause clearly	proposed that may	to seal.
490-26) with	designated	defined and serious	be filed publicly.	
Respect to Issues	Confidential and/or	injury to		
Raised in	Attorneys' Eyes Only	CommScope		
CommScope's	under the Discovery	because it would		
Letter Motion to	Confidentiality Order	reveal confidential		
Compel Specific	(ECF No. 22),	and non-public		
Hardware Discovery	including confidential	information about		
(ECF No. 490)	and non-public	CommScope's trade		
	information about	secrets.		

	CommScope's trade secrets. (See Firouzbakht Decl. ¶ 2).	(Firouzbakht Decl. ¶ 3).		
Declaration of Martin Zimmerman, Ph.D. (ECF No. 490-30) in Support of CommScope's Motion to Compel Specific Hardware Discovery Against Rosenberger Defendants (ECF No. 490)	This Declaration reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets and CommScope's business practices and procedures. (See Firouzbakht Decl.  ¶ 2).	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets and CommScope's business practices and procedures. (Firouzbakht Decl. ¶ 3).	Redacted version of Declaration proposed that may be filed publicly.	Defendants do not oppose the motion to seal.
Exhibit 1 (ECF No.	This Exhibit reveals	Disclosure of this	The confidential	Defendants do not
490-31) to the	information that has	information would	information in this	oppose the motion
Declaration of	been designated	cause clearly	document is	to seal.
Martin Zimmerman,	Confidential and/or	defined and serious	sufficiently	
Ph.D. in Support of	Attorneys' Eyes Only	injury to	pervasive so as to	

CommScope's	under the Discovery	CommScope	render redaction	
Motion to Compel	Confidentiality Order	because it would	unreasonable and	
Specific Hardware	(ECF No. 22),	reveal confidential	unduly burdensome.	
Discovery Against	including confidential	and non-public	Virtually the	
Rosenberger	and non-public	information about	entirety of the	
Defendants (ECF	information about	CommScope's trade	document would	
No. 490-30)	CommScope's trade	secrets.	require redaction to	
	secrets. (See	(Firouzbakht Decl.	prevent a substantial	
	Firouzbakht Decl.	$\P$ 3).	risk of competitive	
	$\P$ 2).		injury.	
Exhibit 2 (ECF No.	This Exhibit reveals	Disclosure of this	The confidential	Defendants do not
490-32) to the	information that has	information would	information in this	oppose the motion
Declaration of	been designated	cause clearly	document is	to seal.
Martin Zimmerman,	Confidential and/or	defined and serious	sufficiently	
Ph.D. in Support of	Attorneys' Eyes Only	injury to	pervasive so as to	
CommScope's	under the Discovery	CommScope	render redaction	
Motion to Compel	Confidentiality Order	because it would	unreasonable and	
Specific Hardware	(ECF No. 22),	reveal confidential	unduly burdensome.	
Discovery Against	including confidential	and non-public	Virtually the	
Rosenberger	and non-public	information about	entirety of the	
Defendants (ECF	information about	CommScope's trade	document would	
No. 490-30)	CommScope's trade	secrets.	require redaction to	
	secrets. (See	(Firouzbakht Decl.	prevent a substantial	
	Firouzbakht Decl.	$\P$ 3).	risk of competitive	
	¶ 2).		injury.	
CommScope's	Document references	Possible injury and	Redacted version	Plaintiff does not
December 8, 2021	discovery material that	prejudice to	proposed that may	oppose the motion
Letter Request to	has been designated as	Rosenberger's	be filed publicly.	to seal.

Compel Discovery	Confidential or	competitive		
(ECF No. 490):	Attorneys' Eyes Only	standing in the base		
	and contains	station antenna		
Pages 2-4, 6-11, 13,	confidential and	marketplace. (See		
15-18, 20-29	personally and	Liu Decl. ¶ 3.)		
	commercially sensitive			
	information about			
	Rosenberger's			
	employees and			
	confidential and non-			
	public information			
	with respect to			
	Rosenberger's			
	business operations,			
	including confidential			
	and commercially			
	sensitive information			
	about Rosenberger's			
	base station antenna			
	design and			
	development			
	processes. (See Liu			
	Decl. ¶ 3.)			
Declaration of	Document references	Possible injury and	Redacted version	Plaintiff does not
Randy Kahnke in	discovery material that	prejudice to	proposed that may	oppose the motion
support of	has been designated as	Rosenberger's	be filed publicly.	to seal.
CommScope's	Confidential or	competitive		
December 8, 2021	Attorneys' Eyes Only.	standing in the base		

Letter Request to Compel Discovery (ECF No. 490-1): Pages 6-7	(See Liu Decl. ¶ 3.)	station antenna marketplace. (See Liu Decl. ¶ 3.)		
Exhibit 2 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-3)	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only. (See Liu Decl. ¶ 3-4.)	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (See Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Plaintiff does not oppose the motion to seal.
Exhibit 3 to the Declaration of Randy Kahnke in support of	Document references discovery material that has been designated as Confidential or	Possible injury and prejudice to Rosenberger's competitive	The confidential information in this document is sufficiently	Plaintiff does not oppose the motion to seal.
CommScope's December 8, 2021	Attorneys' Eyes Only. (See Liu Decl. ¶ 3-4.)	standing in the base station antenna	pervasive so as to render redaction	

Letter Request to Compel Discovery (ECF No. 490-4)		marketplace. (See Liu Decl. ¶¶ 3-4.)	unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	
Exhibit 4 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-5)	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only. (See Liu Decl. ¶ 3-4.)	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (See Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Plaintiff does not oppose the motion to seal.

Exhibit 5 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-6)	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (See Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Plaintiff does not oppose the motion to seal.
	processes. (See Liu Decl. ¶ 3-4.)			
Exhibit 6 to the Declaration of	Document references discovery material that	Possible injury and prejudice to	The confidential information in this	Plaintiff does not oppose the motion
Randy Kahnke in	has been designated as	Rosenberger's	document is	to seal.
support of	Confidential or	competitive	sufficiently	
CommScope's	Attorneys' Eyes Only	standing in the base	pervasive so as to	
December 8, 2021	and contains non-	station antenna	render redaction	
Letter Request to	public information	marketplace. (See	unreasonable and	
Compel Discovery	with respect to	Liu Decl. ¶¶ 3-4.)	unduly burdensome.	
(ECF No. 490-7)	Rosenberger's		Virtually the	

	business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development processes. (See Liu Decl. ¶ 3-4.)		entirety of the document would require redaction to prevent a substantial risk of competitive injury.	
Exhibit 7 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-8)	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (See Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Plaintiff does not oppose the motion to seal.

Exhibit 9 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-10):  Page 2	processes. (See Liu Decl. ¶ 3-4.)  Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only. (See Liu Decl. ¶ 3.)	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (See Liu Decl. ¶ 3.)	Redacted version proposed that may be filed publicly.	Plaintiff does not oppose the motion to seal.
Exhibit 10 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-11):  Pages 1-2, 4	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only. (See Liu Decl. ¶ 3.)	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (See Liu Decl. ¶ 3.)	Redacted version proposed that may be filed publicly.	Plaintiff does not oppose the motion to seal.

Exhibit 11 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-12)	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (See Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Plaintiff does not oppose the motion to seal.
	processes. (See Liu Decl. ¶ 3-4.)			
Exhibit 12 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-13)	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains non-public information with respect to Rosenberger's	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (See Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the	Plaintiff does not oppose the motion to seal.

	business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development processes. (See Liu Decl. ¶ 3-4.)		entirety of the document would require redaction to prevent a substantial risk of competitive injury.	
Exhibit 13 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-14)	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (See Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Plaintiff does not oppose the motion to seal.

	processes. (See Liu Decl. ¶ 3-4.)			
Exhibit 15 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-16)	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development processes. (See Liu Decl. ¶ 3-4.)	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (See Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Plaintiff does not oppose the motion to seal.
Exhibit 16 to the	Document references	Possible injury and	The confidential	Plaintiff does not
Declaration of	discovery material that	prejudice to	information in this	oppose the motion
Randy Kahnke in	has been designated as	Rosenberger's	document is	to seal.
support of	Confidential or	competitive	sufficiently	
CommScope's	Attorneys' Eyes Only	standing in the base	pervasive so as to	
December 8, 2021	and contains non-	station antenna	render redaction	
Letter Request to	public information		unreasonable and	

Compel Discovery (ECF No. 490-17)	with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development processes. (See Liu Decl. ¶ 3-4.)	marketplace. (See Liu Decl. ¶¶ 3-4.)	unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	
Exhibit 17 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-18)	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (See Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Plaintiff does not oppose the motion to seal.

Exhibit 18 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-19)	development processes. (See Liu Decl. ¶ 3-4.)  Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development processes. (See Liu Decl. ¶ 3-4.)	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (See Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Plaintiff does not oppose the motion to seal.
Exhibit 19 to the Declaration of	Document references discovery material that	Possible injury and prejudice to	Redacted version proposed that may	Plaintiff does not oppose the motion
Randy Kahnke in support of CommScope's December 8, 2021	has been designated as Confidential or Attorneys' Eyes Only and contains	Rosenberger's competitive standing in the base station antenna	be filed publicly.	to seal.

Letter Request to	confidential and non-	marketplace. (See		
Compel Discovery	public information	Liu Decl. ¶ 3.)		
(ECF No. 490-20):	with respect to			
	Rosenberger's			
Pages 2-12, 20-21,	business operations,			
26	including confidential			
	and commercially			
	sensitive information			
	about Rosenberger's			
	base station antenna			
	design and			
	development			
	processes. (See Liu			
	Decl. ¶ 3.)			
Exhibit 21 to the	Document references	Possible injury and	Redacted version	Plaintiff does not
Declaration of	discovery material that	prejudice to	proposed that may	oppose the motion
Randy Kahnke in	has been designated as	Rosenberger's	be filed publicly.	to seal.
support of	Confidential or	competitive		
CommScope's	Attorneys' Eyes Only	standing in the base		
December 8, 2021	and contains	station antenna		
Letter Request to	confidential and non-	marketplace. (See		
Compel Discovery	public information	Liu Decl. ¶ 3.)		
(ECF No. 490-22):	with respect to			
	Rosenberger's			
Pages 2-3, 5-11	business operations,			
	including confidential			
	and commercially			
	sensitive information			

Exhibit 22 to the Declaration of	about Rosenberger's base station antenna design and development processes. (See Liu Decl. ¶ 3.)  Document references discovery material that	Possible injury and prejudice to	Redacted version proposed that may	Plaintiff does not oppose the motion
Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-23):  Page 1	has been designated as Confidential or Attorneys' Eyes Only. (See Liu Decl. ¶ 3.)	Rosenberger's competitive standing in the base station antenna marketplace. (See Liu Decl. ¶ 3.)	be filed publicly.	to seal.
Exhibit 23 to the Declaration of Randy Kahnke in support of CommScope's December 8, 2021 Letter Request to Compel Discovery (ECF No. 490-24):	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains confidential and personally and commercially sensitive information about	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (See Liu Decl. ¶ 3.)	Redacted version proposed that may be filed publicly.	Plaintiff does not oppose the motion to seal.

Pages 2-3, 5-6	Rosenberger's employees and			
	confidential and non-			
	public information			
	with respect to			
	Rosenberger's			
	business operations,			
	including confidential			
	and commercially			
	sensitive information			
	about Rosenberger's			
	base station antenna			
	design and			
	development			
	processes, and			
	Rosenberger's			
	strategic business			
	decisions. (See Liu			
	Decl. ¶ 3.)			
Exhibit 24 to the	Document references	Possible injury and	Redacted version	Plaintiff does not
Declaration of	discovery material that	prejudice to	proposed that may	oppose the motion
Randy Kahnke in	has been designated as	Rosenberger's	be filed publicly.	to seal.
support of	Confidential or	competitive		
CommScope's	Attorneys' Eyes Only.	standing in the base		
December 8, 2021	(See Liu Decl. ¶ 3.)	station antenna		
Letter Request to		marketplace. (See		
Compel Discovery		Liu Decl. ¶ 3.)		
(ECF No. 490-25):				

Pages 1-2				
Pages 1-2  Expert Declaration of Dr. Daniel van der Weide (ECF No. 490-26):  Pages 2, 7-8, 13-18, 24, 31-33	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains confidential and personally and commercially sensitive information about Rosenberger's employees and confidential and non-public information with respect to Rosenberger's business operations, including confidential and commercially	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (See Liu Decl. ¶ 3.)	Redacted version proposed that may be filed publicly.	Plaintiff does not oppose the motion to seal.
	sensitive information			
	about Rosenberger's base station antenna			
	design and development			

	processes. (See Liu Decl. ¶ 3.)			
Exhibit 2 to the Declaration of Dr. Daniel van der Weide (ECF No. 490-28)	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains confidential and personally and commercially sensitive information about Rosenberger's employees and confidential and non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's base station antenna design and development processes, and Rosenberger's	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (See Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Plaintiff does not oppose the motion to seal.

Exhibit 3 to the	strategic business decisions. (See Liu Decl. ¶ 3-4.)  Document references	Possible injury and	The confidential	Plaintiff does not
Declaration of	discovery material that	prejudice to	information in this	oppose the motion
Randy Kahnke in	has been designated as	Rosenberger's	document is	to seal.
support of	Confidential or	competitive	sufficiently	w scar.
CommScope's	Attorneys' Eyes Only	standing in the base	pervasive so as to	
December 8, 2021	and contains non-	station antenna	render redaction	
Letter Request to	public information	marketplace. (See	unreasonable and	
Compel Discovery	with respect to	Liu Decl. ¶¶ 3-4.)	unduly burdensome.	
(ECF No. 490-29)	Rosenberger's		Virtually the	
	business operations,		entirety of the	
	including confidential		document would	
	and commercially		require redaction to	
	sensitive information		prevent a substantial	
	about Rosenberger's		risk of competitive	
	base station antenna		injury.	
	design and			
	development			
	processes. (See Liu			
	Decl. ¶ 3-4.)			

## III. <u>Documents previously sealed</u> and submitted in connection with Rosenberger's Letter Opposition to CommScope Letter Motion to Compel (ECF No. 495).

Document	Basis for Sealing	Clearly Defined and Serious Injury	Why a Less Restrictive	Party in Opposition to Sealing, if any,
		that Would Result	Alternative to the	and Basis
		if the Relief is Not	Relief Sought is Not	
		Granted	Available	
Rosenberger's Letter	Subject to the Court's	Sealing Order, ECF No	o. 499, granting the par	ties' Joint Motion to
Opposition to	Seal Pursuant to L. Ci	v. R. 5.3, ECF No. 493		
CommScope Letter				
Motion to Compel				
(ECF No. 495): at 2-				
3, 8, 10-11				
Exhibit A (ECF No.				
495-2) to the				
Declaration of John				
Lu in Support of				
Rosenberger's				
Opposition to				
CommScope's				
Motion to Compel				
(ECF No. 495-1)				
Rosenberger's Letter	Subject to the Court's	Sealing Order, ECF No	o. 487, granting Joint M	Iotion to Seal
Opposition to	Pursuant to L. Civ. R.	5.3, ECF No. 472. See	also Consolidated Inde	ex in Support of the
CommScope Letter	Joint Motion to Seal, I	ECF No. 472-3 (moving	g to seal transcript of th	e Deposition of Dr.
Motion to Compel	van der Weide).			

(ECF No. 495): at
16-17
Exhibit I (ECF No.
495-10) to the
Declaration of John
Lu in Support of
Rosenberger's
Opposition to
CommScope's
Motion to Compel
(ECF No. 495-1)

## IV. <u>Documents submitted in connection with Rosenberger's Letter Opposition to CommScope Letter Motion to Compel (ECF No. 495).</u>

Document	Basis for Sealing	Clearly Defined and Serious Injury	Why a Less Restrictive	Party in Opposition to
		that Would Result	Alternative to the	Sealing, if any, and
		if the Relief is Not	Relief Sought is	Basis
		Granted	Not Available	
Rosenberger's	These portions of the	Disclosure of this	Redacted version of	Defendants do not
Letter Opposition to	Letter reveal	information would	Letter proposed that	oppose the motion
CommScope Letter	information that has	cause clearly	may be filed	to seal.
Motion to Compel	been designated	defined and serious	publicly.	
(ECF No. 495): at	Confidential and/or	injury to		
14	Attorneys' Eyes Only	CommScope		
	under the Discovery	because it would		

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's business practices and procedures. (See Firouzbakht Decl.	reveal confidential and non-public information about CommScope's business practices and procedures. (Firouzbakht Decl. ¶ 3).		
Rosenberger's Letter Opposition to CommScope Letter Motion to Compel (ECF No. 495): at 14 n.7	These portions of the Letter reveal information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets.	Redacted version of Letter proposed that may be filed publicly.	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	secrets. (See	(Firouzbakht Decl.		
	Firouzbakht Decl.	$\P$ 3).		
	¶ 2).			
Exhibit D (ECF No.	This Exhibit reveals	Disclosure of this	The confidential	Defendants do not
495-5) to the	information that has	information would	information in this	oppose the motion
Declaration of John	been designated	cause clearly	document is	to seal.
Lu in Support of	Confidential and/or	defined and serious	sufficiently	
Rosenberger's	Attorneys' Eyes Only	injury to	pervasive so as to	
Opposition to	under the Discovery	CommScope	render redaction	
CommScope's	Confidentiality Order	because it would	unreasonable and	
Motion to Compel	(ECF No. 22),	reveal confidential	unduly burdensome.	
(ECF No. 495-1)	including confidential	and non-public	Virtually the	
	and non-public	information about	entirety of the	
	information about	CommScope's trade	document would	
	CommScope's trade	secrets.	require redaction to	
	secrets. (See	(Firouzbakht Decl.	prevent a substantial	
	Firouzbakht Decl.	¶ 3).	risk of competitive	
	¶ 2).		injury.	
Exhibit E (ECF No.	This Exhibit reveals	Disclosure of this	The confidential	Defendants do not
495-6) to the	information that has	information would	information in this	oppose the motion
Declaration of John	been designated	cause clearly	document is	to seal.
Lu in Support of	Confidential and/or	defined and serious	sufficiently	
Rosenberger's	Attorneys' Eyes Only	injury to	pervasive so as to	

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
Opposition to CommScope's Motion to Compel (ECF No. 495-1)	under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (See Firouzbakht Decl. ¶ 2).	CommScope because it would reveal confidential and non-public information about CommScope's trade secrets.  (Firouzbakht Decl. ¶ 3).	render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	
Exhibit F (ECF No. 495-7) to the Declaration of John Lu in Support of Rosenberger's Opposition to CommScope's Motion to Compel (ECF No. 495-1)	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets.	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	secrets. (See Firouzbakht Decl. ¶ 2).	(Firouzbakht Decl. ¶ 3).	prevent a substantial risk of competitive injury.	
Exhibit G (ECF No. 495-8) to the Declaration of John Lu in Support of Rosenberger's Opposition to CommScope's Motion to Compel (ECF No. 495-1)	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's business practices and policies. (See Firouzbakht Decl. ¶ 2).	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's business practices and policies (Firouzbakht Decl. ¶ 3).	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Defendants do not oppose the motion to seal.
Exhibit H (ECF No. 495-9) to the Declaration of John	This Exhibit reveals information that has been designated	Disclosure of this information would cause clearly	Redacted version of Exhibit proposed	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
Lu in Support of Rosenberger's Opposition to CommScope's Motion to Compel (ECF No. 495-1)	Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (See Firouzbakht Decl. ¶ 2).	defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets.  (Firouzbakht Decl. ¶ 3).	that may be filed publicly.	
Exhibit J (ECF No. 495-11) to the Declaration of John Lu in Support of Rosenberger's Opposition to CommScope's Motion to Compel (ECF No. 495-1)	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would	Defendants do not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
	CommScope's trade secrets. (See Firouzbakht Decl. ¶ 2).	secrets. (Firouzbakht Decl. ¶ 3).	require redaction to prevent a substantial risk of competitive injury.	
Exhibit K (ECF No. 495-12) to the Declaration of John Lu in Support of Rosenberger's Opposition to CommScope's Motion to Compel (ECF No. 495-1)	This Exhibit reveals information that has been designated Confidential and/or Attorneys' Eyes Only under the Discovery Confidentiality Order (ECF No. 22), including confidential and non-public information about CommScope's trade secrets. (See Firouzbakht Decl.  ¶ 2).	Disclosure of this information would cause clearly defined and serious injury to CommScope because it would reveal confidential and non-public information about CommScope's trade secrets.  (Firouzbakht Decl. ¶ 3).	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial risk of competitive injury.	Defendants do not oppose the motion to seal.
Rosenberger's	Document references	Possible injury and	Redacted version	Plaintiff does not
December 20, 2021 Letter in Opposition	discovery material that has been designated as	prejudice to Rosenberger's	proposed that may be filed publicly.	oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
to CommScope's	Confidential or	competitive		
Request to Compel	Attorneys' Eyes Only	standing in the base		
Discovery (ECF No.	and contains	station antenna		
495):	confidential and	marketplace. (See		
	personally and	Liu Decl. ¶ 3.)		
Pages 1-4, 6-13, 15-	commercially sensitive			
17	information about			
	Rosenberger's			
	employees and			
	confidential and non-			
	public information			
	with respect to			
	Rosenberger's			
	business operations,			
	including confidential			
	and commercially			
	sensitive information			
	about Rosenberger's			
	base station antenna			
	design and			
	development			
	processes. (See Liu			
	Decl. ¶ 3.)			

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
Declaration of Cai	Document references	Possible injury and	Redacted version	Plaintiff does not
Lishao in support of	discovery material that	prejudice to	proposed that may	oppose the motion
Rosenberger's	has been designated as	Rosenberger's	be filed publicly.	to seal.
December 20, 2021	Confidential or	competitive		
Opposition to	Attorneys' Eyes Only	standing in the base		
CommScope's	and contains non-	station antenna		
Request to Compel	public information	marketplace. (See		
Discovery (ECF No.	with respect to	Liu Decl. ¶ 3.)		
495-3):	Rosenberger's			
	business operations,			
Pages 3-5	including confidential			
	and commercially			
	sensitive information			
	about Rosenberger's			
	base station antenna			
	design and			
	development			
	processes. (See Liu			
	Decl. ¶ 3.)			
Exhibit C to the	Document references	Possible injury and	Redacted version	Plaintiff does not
Declaration of John	discovery material that	prejudice to	proposed that may	oppose the motion
Lu in support of	has been designated as	Rosenberger's	be filed publicly.	to seal.
Rosenberger's	Confidential or	competitive		

Document	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Party in Opposition to Sealing, if any, and Basis
December 20, 2021 Opposition to CommScope's Request to Compel Discovery (ECF No. 495-4): Page 2	Attorneys' Eyes Only. (See Liu Decl. ¶ 3.)	standing in the base station antenna marketplace. (See Liu Decl. ¶ 3.)		
Exhibit H to the Declaration of John Lu in support of Rosenberger's December 20, 2021 Opposition to CommScope's Request to Compel Discovery (ECF No. 495-9)	Document references discovery material that has been designated as Confidential or Attorneys' Eyes Only and contains non-public information with respect to Rosenberger's business operations, including confidential and commercially sensitive information about Rosenberger's	Possible injury and prejudice to Rosenberger's competitive standing in the base station antenna marketplace. (See Liu Decl. ¶¶ 3-4.)	The confidential information in this document is sufficiently pervasive so as to render redaction unreasonable and unduly burdensome. Virtually the entirety of the document would require redaction to prevent a substantial	Plaintiff does not oppose the motion to seal.

Document	Basis for Sealing	Clearly Defined	Why a Less	Party in
		and Serious Injury	Restrictive	Opposition to
		that Would Result	Alternative to the	Sealing, if any, and
		if the Relief is Not	Relief Sought is	Basis
		Granted	Not Available	
	base station antenna		risk of competitive	
	design and		injury.	
	development			
	processes. (See Liu			
	Decl. ¶ 3-4.)			